



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAY 1 2012

Mr. David Poole, Esq.
General Counsel
Range Resources, Inc.
100 Throckmorton Street, Suite 1200
Fort Worth, Texas 76102

**Re: Request for Information for Certain Facilities Operated by Range Resources, Inc.
Pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a) and
Section 114 of the Clean Air Act, 42 U.S.C. § 7414**

Dear Mr. Poole:

The purpose of this letter is to seek further information to determine whether Range Resources, Inc. (including its subsidiary Range Resources-Appalachia, LLC) (hereinafter "Range") is in compliance with the Spill Prevention, Control and Countermeasures ("SPCC") regulations found at 40 C.F.R. Part 112, and with the General Duty Clause of Section 112(r)(1) of the Clean Air Act ("CAA"), as amended, 42 U.S.C. § 7414(r)(1), at the facilities listed in Enclosure 1 (hereinafter "Facilities"), which the U.S. Environmental Protection Agency ("EPA") inspected on January 24 and 25, 2012.

The SPCC regulations at 40 C.F.R. Part 112 establish procedures, methods, equipment, and other requirements to prevent the discharge of oil from non-transportation-related onshore and offshore facilities into or upon the navigable waters of the United States or adjoining shorelines. The SPCC regulations, which were mandated by the Clean Water Act ("CWA") Section 311(j), 33 U.S.C. § 1321(j), were promulgated in 1973 (38 Fed. Reg. 34164) and significantly amended in 2002 (67 Fed. Reg. 47042). As required by 40 C.F.R. § 112.3(a)(1), the compliance date for facilities subject to the SPCC regulations where operations began after August 16, 2002 is November 10, 2011 (see also 75 Fed. Reg. 63093). A facility is subject to the SPCC regulations if, due to its location, it could reasonably be expected to discharge oil into or upon the navigable waters of the United States and has a total above-ground storage capacity exceeding 1,320 gallons or a total underground storage capacity of greater than 42,000 gallons. Owners or operators that are subject to the SPCC regulations must prepare and implement for their facility an SPCC Plan in accordance with 40 C.F.R. § 112.7.

Section 112(r)(1) of the CAA, known as the General Duty Clause, imposes primary responsibility on owners and operators to prevent the accidental release and to minimize the consequences of any such release of a substance listed pursuant to Section 112(r)(3) of the CAA,

or any other extremely hazardous substance. The General Duty Clause imposes on the owner or operator of a stationary source a general duty to identify hazards which may result from accidental releases using appropriate hazard assessment techniques, to design and maintain a safe facility taking such steps as are necessary to prevent releases, and to minimize the consequences of accidental releases which do occur. Many industries have developed standards and generally recognized safe practices to manage the risks associated with extremely hazardous substances, which can aid facilities in their compliance with the requirements of the General Duty Clause. Adherence to recognized industry standards and practices (as well as any government regulations) can serve as a benchmark to determine compliance with the General Duty Clause.

EPA is currently evaluating information obtained and observations made on January 24 and 25, 2012, during its inspections of the Range Facilities listed in Enclosure 1. You are hereby required to submit to EPA the additional information requested in Enclosures 4 and 5 within **thirty (30) calendar days** of your receipt of this letter pursuant to Section 308(a) of the CWA, 33 U.S.C. § 1318(a), and Section 114(a) of the CAA, 42 U.S.C. § 7414(a). Instructions for responding to this request for information can be found in Enclosure 3.

Failure to fully respond to this request may subject Range to enforcement action under Section 309 of the CWA, 33 U.S.C. § 1319, and/or Section 113 of the CAA, 42 U.S.C. § 7413. In addition, providing false, fictitious or fraudulent statements or representations may subject Range to criminal penalties under Section 309(c)(4) of the CWA, 33 U.S.C. § 1319(c)(4), Section 113(c)(2) of the CAA, 42 U.S.C. § 7413(c)(2), and 18 U.S.C. § 1001. The information Range provides may be used by EPA in administrative, civil, or criminal proceedings.

Range's response should be submitted within **thirty (30) days** of your receipt of this letter to:


**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III,
ATTN: JOAN ARMSTRONG, CHIEF
OIL AND PREVENTION BRANCH (3HS61)
1650 ARCH STREET
PHILADELPHIA, PA 19103-2029**

Range may assert a claim of business confidentiality for any portion of the submitted information under 40 C.F.R. Part 2, Subpart B. Information subject to a business confidentiality claim is available to the public only to the extent allowed under 40 C.F.R. Part 2, Subpart B. If Range fails to assert a business confidentiality claim, all submitted information may be made available to the public without further notice. If Range desires to assert a claim of business confidentiality, please see Enclosure 6, *Business Confidentiality Claims/Disclosure to EPA Contractors & Grantees of Your Response* for further information.

This information request is not subject to the requirements of the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific entities as part of an administrative investigation.

If Range has any questions regarding this matter, you may contact Andrea Bain for specific information related to the SPCC regulations and Mike Welsh for specific information related to the General Duty Clause. Ms. Bain may be contacted at (215) 814-3292, and Mr. Welsh may be contacted at (215) 814-3285.

Sincerely,



Ronald J. Borsellino, Director
Hazardous Site Cleanup Division

Enclosures (7)

cc: Mike Welsh (3HS61)
Andrea Bain (3HS61)

ENCLOSURE 1

LIST OF RANGE FACILITIES SUBJECT TO EPA'S INSPECTION
ON JANUARY 24 AND 25, 2012

- (1) (b) (6) Well Site
(b) (6) API # 37-125-22941
(b) (6)
McMurray, Pennsylvania
- (2) (b) (6) Well Site
(b) (6) API #s: 37-125-22505 and 37-125-22864
(b) (6)
Hickory, Pennsylvania
- (3) (b) (6) 1-6 Well Site
(b) (6) API #s: 37-125-23032; 37-125-23690; 37-125-23691; 37-125-23692; 37-125-23735;
37-125-23822
(b) (6)
Washington, Pennsylvania
- (4) (b) (6)
(b) (6) API # 37-125-22471
(b) (6)
Hickory, Pennsylvania
- (5) (b) (6)
(b) (6) API # 37-125-23639
(b) (6)
Hickory, Pennsylvania
- (6) (b) (6)
(b) (6) API # 37-125-22447
(b) (6)
Hickory, Pennsylvania
- (7) (b) (6) Site
(b) (6) API # 37-125-22401
(b) (6)
Hickory, Pennsylvania
- (8) (b) (6) Well Site
(b) (6) API #s: 37-125-22238 and 37-125-22088
(b) (6)
Hickory, Pennsylvania

ENCLOSURE 2A

DEFINITIONS FOR CWA QUESTIONS

1. The term "you" or "Range" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, subcontractors, trustees, successors, assigns, and agents.
2. The term "person" shall have the same definition as in Section 311(a) of the CWA, 33 U.S.C. § 1321(a): an individual, firm, corporation, association, and a partnership.
3. The term "discharge," as defined in Section 311(a) of the CWA, shall include, but is not limited to, any spilling, leaking, pumping, pouring, emitting, emptying, or dumping, but excludes certain discharges in compliance with a permit under Section 402 of the CWA.
4. The term "navigable waters" shall mean as defined in Section 502(7) of the CWA, and includes: (1) All navigable waters of the United States, as defined in judicial decisions prior to passage of the 1972 Amendments to the CWA (Pub. L. 92-500), and tributaries of such waters; (2) Interstate waters; (3) Intrastate lakes, rivers, and streams which are utilized by interstate travelers for recreational or other purposes; and (4) Intrastate lakes, rivers, and streams from which fish or shellfish are taken and sold in interstate commerce.
5. The term "oil" shall have the same meaning as defined in Section 311(a)(1) of the CWA, 33 U.S.C. § 1321(a): oil of any kind or in any form, including, but not limited to, petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil. "Oil" shall also mean, as further defined by 40 C.F.R. § 112.2: oil of any kind or in any form, including, but not limited to: fats, oils, or greases of animal, fish, or marine mammal origin; vegetable oils, including oils from seeds, nuts, fruits, or kernels; and, other oils and greases, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.
6. The term "mobile refueler" shall mean, as defined in 40 C.F.R. § 112.2, a bulk storage container onboard a vehicle or towed, that is designed or used solely to store and transport fuel for transfer into or from an aircraft, motor vehicle, locomotive, vessel, ground service equipment, or other oil storage container.
7. The term "oil-filled operational equipment" shall mean, as defined in 40 C.F.R. § 112.2, equipment that includes an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device. Oil-filled operational equipment is not considered a bulk storage container, and does not include oil-filled manufacturing equipment (flow-through process). Examples of oil-filled operational equipment include, but are not limited to, hydraulic systems, lubricating systems (e.g., those for pumps, compressors and other rotating equipment, including pumpjack lubrication systems), gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device.

8. The term "inspection" shall mean the inspection conducted by EPA personnel at the Facilities identified in Enclosure 1 on January 24 and 25, 2012, to determine compliance with Section 311 of the CWA, 33 U.S.C. § 1321, and implementing regulations at 40 C.F.R. Part 112.
9. The term "day" shall mean a business day or any day other than a Saturday, Sunday or Federal holiday.

ENCLOSURE 2B

DEFINITIONS FOR CAA QUESTIONS

1. The term "you" or "Range" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, subcontractors, trustees, successors, assigns, and agents.
2. The term "person" shall have the same definition as in Section 302(e) of the CAA, 42 U.S.C. § 7602(e): an individual, corporation, partnership, association, State, municipality, political subdivision of a State, and any agency, department, or instrumentality of the United States and any officer, agent, or employee thereof.
3. The term "regulated substance" shall have the same definition as that contained in Section 112(r)(2)(B) of the CAA, 42 U.S.C. § 7412(r)(2)(B): a substance listed under paragraph (3) [42 U.S.C. § 7412(r)(3)]. Such list is published at 40 C.F.R. § 68.130. Section 112(r)(3) of the CAA, 42 U.S.C. § 7412(r)(3), further describes a regulated substance to be, in the case of an accidental release, a substance that is known to cause or may reasonably be anticipated to cause death, injury or serious adverse effects to human health or the environment.
4. The term "extremely hazardous substance" or "EHS" shall mean any agent that is known to cause or may reasonably be anticipated to cause death, injury or serious adverse effects to human health or the environment, including regulated substances and any agent which may or may not be listed or otherwise identified by any Government agency which may, as the result of short-term exposures associated with releases to the air, cause death, injury or property damage due to its toxicity, reactivity, flammability, volatility, or corrosivity.
5. The term "stationary source" shall have the same definition as that contained in Section 112(r)(2)(C) of the CAA, 42 U.S.C. § 7412(r)(2)(C): any buildings, structures, equipment, installations or substance emitting stationary activities (i) which belong to the same industrial group, (ii) which are located on one or more contiguous properties, (iii) which are under the control of the same person (or persons under common control), and (iv) from which an accidental release may occur.
6. The term "process" shall mean any activity involving a regulated substance or any other extremely hazardous substance including, but not limited to, any use, storage, manufacturing, handling, or on-site movement of such substances, or combination of these activities. For purposes of this Information Request, the equipment involved in the process includes, but is not limited to, the well(s), oil/gas separator(s), natural gas condensate tanks, well treatment tank(s), and associated equipment/appurtenances/containment/piping including piping downstream from the oil/gas separator to the manifold/equipment of the midstream service provider.
7. The term "MSDS" shall mean Material Safety Data Sheet.
8. The term "API" shall mean American Petroleum Institute.

9. The term "inspection" shall mean the inspection conducted by EPA personnel at the Facilities identified in Enclosure 1 on January 24 and 25, 2012, to determine compliance with Section 112(r)(1) of the CAA, 42 U.S.C. § 7412(r)(1).
10. The term "day" shall mean a business day or any day other than a Saturday, Sunday or Federal holiday.

ENCLOSURE 3

INSTRUCTIONS

1. Please provide a separate narrative response to each and every Question and subpart of a Question set forth in this Information Request. If Range cannot provide the information requested or provide a complete response to a question, please provide an explanation.
2. Precede any answer with the number of the Question to which it corresponds.
3. If information or documents not known or not available to Range as of the date of submission of a response to this Information Request should later become known or available to Range, Range must supplement its response to EPA. Moreover, should Range find at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth, Range must notify EPA of this fact as soon as possible and provide EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it corresponds.
5. Range must submit all requested information under an authorized signature certifying that the information is true and complete to the best knowledge of the certifying official after due inquiry. At the bottom of Range's response letter, please include the following certification:

CERTIFICATION:

I certify under penalty of law that I have personally examined and am familiar with the information submitted and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Name and official title of owner/operator

Signature

Date signed

ENCLOSURE 4A

GENERAL INFORMATION REQUESTED

1. List the full names of all owners of each Facility, including persons and incorporated or unincorporated entities. Include the dates of ownership for each person/entity listed. Also include the form of organization of each owner (corporation, LLC, LLP, etc.), the president/CEO/principal, the date it was organized/incorporated, the state in which it was organized/incorporated, and the address of the headquarters office.
2. Provide the full names of all operators of each Facility, including persons, and incorporated or unincorporated entities. Include the dates of operation for each person/entity listed. Also include the form of organization of each operator (corporation, LLC, LLP, etc.), the president/CEO/principal, the date it was organized/incorporated, the state in which it was organized/incorporated, and the address of the headquarters office.
3. Identify the names and addresses of all partners of each Facility if any ever was a partnership of any kind. Include the dates of the partnership(s) for each Facility.
4. Identify the year Range first owned and/or operated each Facility.
5. Identify the date the operations began at each Facility.
6. Identify the Standard Industrial Classification (SIC) and North American Industry Classification System (NAICS) codes for each Facility.
7. If information or documents responsive to this request are not in your possession, custody, or control, identify the persons by name, address, and phone number from whom such information or documents may be obtained.